

CAHILL GORDON & REINDEL LLP  
EIGHTY PINE STREET  
NEW YORK, NY 10005-1702

FLOYD ABRAMS  
L. HOWARD ADAMS  
ROBERT A. ALESSI  
HELENE R. BANKS  
ANIRUDH BANSAL  
LANDIS C. BEST  
SUSAN BUCKLEY  
KEVIN J. BURKE  
JAMES J. CLARK  
BENJAMIN J. COHEN  
SEAN M. DAVIS  
STUART G. DOWNING  
ADAM M. DWORKIN  
ANASTASIA EFIMOVA  
JENNIFER B. EZRING  
JOAN MURTAGH FRANKEL  
JONATHAN J. FRANKEL  
BART FRIEDMAN

CIRO A. GAMBOA  
WILLIAM B. GANNETT  
CHARLES A. GILMAN  
STEPHEN A. GREENE  
JASON M. HALL  
WILLIAM M. HARTNETT  
CRAIG M. HOROWITZ  
DOUGLAS S. HOROWITZ  
TIMOTHY B. HOWELL  
DAVID G. JANUSZEWSKI  
ELAI KATZ  
THOMAS J. KAVALER  
BRIAN S. KELLEHER  
DAVID N. KELLEY  
CHÉRIE R. KISER\*  
EDWARD P. KRUGMAN  
JOEL KURTZBERG  
ALIZA R. LEVINE

TELEPHONE: (212) 701-3000  
FACSIMILE: (212) 269-5420

1990 K STREET, N.W.  
WASHINGTON, DC 20006-1181  
(202) 862-8900  
FAX: (202) 862-8958

AUGUSTINE HOUSE  
6A AUSTIN FRIARS  
LONDON, ENGLAND EC2N 2HA  
(011) 44.20.7920.9800  
FAX: (011) 44.20.7920.9825

WRITER'S DIRECT NUMBER  
(212) 701-3406

JOEL H. LEVITIN  
GEOFFREY E. LIEBMANN  
ANN S. MAKICH  
JONATHAN I. MARK  
BRIAN T. MARKLEY  
WILLIAM J. MILLER  
NOAH B. NEWITZ  
MICHAEL J. OHLER  
ATHY A. O'KEEFFE  
DAVID R. OWEN  
JOHN PAPACHRISTOS  
LUIS R. PENALVER  
KIMBERLY PETILLO-DÉCOSSARD  
DEAN RINGEL  
JAMES ROBINSON  
THORN ROSENTHAL  
TAMMY L. ROY  
JONATHAN A. SCHAFFZIN

JOHN SCHUSTER  
MICHAEL A. SHERMAN  
DARREN SILVER  
HOWARD G. SLOANE  
JOSIAH M. SLOTNICK  
RICHARD A. STIEGLITZ JR.  
SUSANNA M. SUH  
ANTHONY K. TAMA  
JONATHAN D. THIER  
JOHN A. TRIPODORO  
GLENN J. WALDRIP, JR.  
HERBERT S. WASHER  
MICHAEL B. WEISS  
S. PENNY WINDLE  
DAVID WISHENGRAF  
COREY WRIGHT  
DANIEL J. ZUBKOFF  
ADAM ZUROFSKY

\*ADMITTED IN DC ONLY

November 5, 2014

Re: *HLP Properties, LLC, et al v. Consolidated Edison Co. of New York, Inc.*, No. 14-CV-1383 (LGS) (S.D.N.Y.)

Dear Judge Schofield:

We represent Defendant Consolidated Edison Company of New York, Inc. ("Con Edison") in the above-captioned matter. We submit this letter to provide the Court with the information requested at yesterday's conference regarding Con Edison's MGP project managers and their supervisor.

Kenneth Kaiser is the Section Manager of MGP Remediation in Con Edison's Environmental Health & Safety department with overall responsibility for the MGP program. Mr. Kaiser has responsibility for the supervision of all MGP project managers at all of Con Edison's MGP sites, including the three involved here. The project managers at the MGP sites that correspond to the 5 parcels chosen by Plaintiffs are: (1) Neil O'Halloran, Project Manager, West 18<sup>th</sup> Street MGP Site (the site that includes the Plaintiffs' parcel), (2) Richard Rienzo, Project Manager, West 42<sup>nd</sup> Street MGP Site (3) and Yelena Skorobogatov, Project Manager, White Plains MGP Site. These three project managers each manage between 5 to 7 MGP sites. Their primary responsibilities are to develop schedules and budgets, oversee consultants and act as points of contact with property owners and the DEC.

Respectfully submitted,

/s/ Thomas J. Kavaler

Thomas J. Kavaler

CAHILL GORDON & REINDEL LLP

- 2 -

The Honorable Lorna G. Schofield  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

VIA ECF

cc: All Counsel (via ECF)